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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHAWN P. LAMPMAN,

Defendants.

Case No.: 2:13-CR-0137-JCM-CWH

**STIPULATION TO MODIFY
JUDGMENT IN A CRIMINAL CASE
RECOMMENDATIONS TO THE
BUREAU OF PRISONS
REGARDING IMPRISONMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, United States of America, by and through its attorney, STEVEN W. MYHRE, First Assistant United States Attorney, and Defendant, SHAWN P. LAMPMAN, by and through his attorney MARK B. BAILUS, ESQ. of the law firm BAILUS COOK & KELESIS, LTD., that the recommendation to the Bureau of Prisons in the Judgment in a Criminal Case (Doc. #52) be modified to state that Defendant be imprisoned in a facility as close to Denver, Colorado as possible.

This stipulation is entered into for the following reasons:

1. In the Judgment in a Criminal Case (Doc. #52) ("Judgment"), it is recommended that Defendant be imprisoned in a "facility as close to Las Vegas, Nevada as possible." However, Defendant's mother, Sally Story, is currently in the process of relocating to Littleton, Colorado with the Defendant's autistic grandson, Aries - age 5, due to his need for specialized services available in the Littleton area. As such, it is requested that the Judgment be modified to state that the Defendant be imprisoned in a facility as close to Denver, Colorado as possible

1 rather than Las Vegas, Nevada.

2 DATED this 12th day of March, 2015.

3 BAILUS COOK & KELESIS, LTD.

UNITED STATES OF AMERICA

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5
6 By /s/ Mark B. Bailus
MARK B. BAILUS, ESQ.
7 Nevada Bar No. 2284
517 South Ninth Street
8 Las Vegas, Nevada 89101
Attorneys for Defendant

By /s/ Steven W. Myhre
STEVEN W. MYHRE
First Assistant United States Attorney
333 So. Las Vegas Blvd., 5th Floor
Las Vegas, Nevada 89101
Attorneys for Plaintiff

10 **ORDER**

11 **IT IS THEREFORE ORDERED** that the recommendation to the Bureau of Prisons in
12 the Judgment in a Criminal Case (Doc. #52) is modified to state that Defendant be imprisoned in
13 a facility as close to Denver, Colorado as possible.

14 DATED March 16, 2015.

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16 
17 UNITED STATES DISTRICT JUDGE
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19 Submitted by:

20 BAILUS COOK & KELESIS, LTD.

21
22 /s/ Mark B. Bailus
Mark B. Bailus, Esq. (2284)
23 517 South Ninth Street
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24 *Attorneys for Defendant*